

Center for Disability Advocacy Rights (CeDAR), Inc.

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Via ECF

Hon Barbara C. Moses United States Magistrate Judge Southern District of New York 500 Pearl Street New York, NY 10007 MEMO ENDORSED

Application GRANTED. SO ORDERED.

Labere 1585

Barbara Moses, U.S.M.J.

March 17, 2020

Re: <u>Martinez v. Saul</u>

1:19-cy-06515-BCM

Dear Judge Moses:

As the attorney for the above plaintiff in the above captioned case, I write to request an extension of time to file plaintiff's Motion for Judgment on the Pleadings. Plaintiff's papers are due to be filed today. I have previously sought two extensions to file plaintiff's settlement letter.

I seek an extension of time to file plaintiff's Motion for Judgment on the pleadings due, in part, to the disruption in my schedule over the past week. My oldest son was sent home from college last Tuesday and my younger children are home on account of the Covid-19. I have had to take time off to orchestrate their needs and schedules. In addition, Mr. Martinez's case is considerably lengthy and requires additional time for me to finish. With the kind consent of opposing counsel, AUSA Joseph Pantoja. I respectfully request that the Court extend and approve the following revised briefing schedule:

April 16, 2020
March 16, 2020
Plaintiff's Motion for Judgment on the Pleadings
May 23, 2020
Defendant's Motion for Judgment on the Pleadings
June 13, 2020
Plaintiff's Reply

Thank you for Your Honor's attention to this matter.

Very truly yours,

/s/ Christopher J. Bowes
Christopher J. Bowes, Esq

Cc: AUSA Joseph Pantoja CHRISTOPHER J. BOWES, ESQ.